

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

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In re:	:	
	:	PROMESA
THE FINANCIAL OVERSIGHT AND	:	Title III
MANAGEMENT BOARD FOR PUERTO RICO,	:	
	:	Case No. 17-BK-3283 (LTS)
as representative of	:	
	:	(Jointly Administered)
THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> ,	:	
	:	
Debtors. ¹	:	
	X	

**APPLICATION AND ORDER FOR *PRO HAC VICE* ADMISSION OF
MICHAEL A. FRIEDMAN OF GENOVESE JOBLOVE & BATTISTA, P.A**

COMES NOW, Michael A. Friedman (“Applicant”) on behalf of Genovese Joblove & Battista, P.A. (“GJB”) and pursuant to Local Civil Rule 83(A)(f) of the Local Rules of the United States District Court for the District of Puerto Rico, and respectfully states:

1. Applicant is an attorney and a member of the law firm of Genovese Joblove & Battista, P.A., who address is 100 N. Tampa Street, Suite 2600, Tampa, Florida 33602. Additionally, the firm maintains offices at PNC Center, 200 East Broward Boulevard, Suite 1110, Fort Lauderdale, Florida 33301; and Miami Tower, 100 S.E. 2nd Street, Suite 4400, Miami,

¹ The Debtors in these jointly-administered PROMESA title III cases, along with each Debtor’s respective title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are: (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric and Power Authority (Bankruptcy Case No. 17 BK 4780) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (Bankruptcy Case No. 19 BK 5523-LTS) (Last Four Digits of Federal Tax ID: 3801).

Florida 33131.

2. Applicant makes the request to appear *pro hac vice* to represent the Official Committee of Unsecured Creditors for all Title III Debtors (other than COFINA and PBA), as special litigation counsel in the above jointly administered cases pending before the United States District Court of Puerto Rico, including the associated adversary proceedings.

3. Applicant will sign all pleadings with the name Michael A. Friedman.

4. Applicant's contact information is:

Michael A. Friedman, Esq.
Genovese Joblove & Battista, P.A.
100 N. Tampa Street, Suite 2600
Tampa, FL 33602
Primary Email: mfriedman@gjb.law
Secondary Email: btraina@gjb.law
Telephone: (813) 439-3100
Fax: (813) 439-3110

5. Applicant is a member in good standing of the bars of the highest court of the State of Florida with bar license number 71828. Applicant has been admitted to practice before the following federal courts: U.S. Supreme Court, U.S. Court of Appeals for the Eleventh Circuit, U.S. District Court for the Southern District of Florida, U.S. District Court for the Middle District of Florida, U.S. Bankruptcy Court for the Middle District of Florida, U.S. Bankruptcy Court for the Southern District of Florida, and has been admitted *pro hac vice* in the Central District Court of California.

6. Applicant is not currently suspended from the practice of law before any court or jurisdiction, and is not currently the subject of any complaint for unethical conduct, disciplinary proceeding or criminal charges before any court or jurisdiction.

7. During the past three (3) years, Applicant has not filed *pro hac vice* admissions in the United States Bankruptcy Court for the District of Puerto Rico.

8. Local counsel of record associated with Applicant in this matter is:

Juan J. Casillas Ayala, Esq.
CASILLAS, SANTIAGO & TORRES LLC
(USDC-PR 218312)
PO Box 195075
San Juan, PR 00919-5075
Telephone: (787) 5223-3434
E-mail: jcasillas@cstlawpr.com

9. Applicant has read the local rules of the United States District Court for the District of Puerto Rico and will comply with the same.

10. In addition, Applicant has read the Local Rules of the United States District Court for the District of Puerto Rico, which provide in part that attorneys appearing *pro hac vice* must comply with the provisions set forth therein and pay an admission fee of \$300.00 per appearance in each new case before the Court. Accordingly, contemporaneously with the filing of this motion, the payment of the *pro hac vice* admission fee has been made contemporaneously with the instant filing.

WHEREFORE, Applicant respectfully requests to be admitted to practice in the United States Bankruptcy Court for the District of Puerto Rico for the above-captioned case only.

Date: December 1, 2021.

Michael A. Friedman, Esq.
Printed Name of Applicant

/s/ Michael A. Friedman, Esq.
Signature of Applicant

I HEREBY CERTIFY, pursuant to Local Rule 83(A)(f), that I consent to the designation of local counsel of record for all purposes.

Date: December 1, 2021.

By: /s/ Juan J. Casillas-Ayala
Juan J. Casillas-Ayala, Esq.
CASILLAS, SANTIAGO & TORRES LLC
Juan J. Casillas-Ayala, Esq.
(USDC - PR 218312)
Israel Fernández Rodríguez, Esq.
(USDC - PR 225004)
Juan C. Nieves González, Esq.
(USDC - PR 231707)
Cristina B. Fernández Niggemann, Esq.
(USDC - PR 306008)
PO Box 195075
San Juan, PR 00919-5075
Tel.: (787) 523-3434
Fax: (787) 523-3433
jcasillas@cstlawpr.com
ifernandez@cstlawpr.com
jnieves@cstlawpr.com
cfernandez@cstlawpr.com

Counsel to the Official Committee of Unsecured Creditors

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing document was electronically filed with the Clerk of the Court using the CM/ECF System, which sent notification of such filing to all attorneys and interested parties registered to receive electronic notification on this matter, and the original upon the Clerk of Court accompanied by a \$300.00 *pro hac vice* admission fee.

Date: December 1, 2021.

By: /s/ Juan J. Casillas-Ayala

Juan J. Casillas-Ayala, Esq.

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(USDC - PR 306008)

PO Box 195075

San Juan, PR 00919-5075

Tel.: (787) 523-3434

Fax: (787) 523-3433

jcasillas@cstlawpr.com

ifernandez@cstlawpr.com

jnieves@cstlawpr.com

cfernandez@cstlawpr.com

*Counsel to the Official Committee of Unsecured
Creditors*

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

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In re: :
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THE FINANCIAL OVERSIGHT AND : PROMESA
MANAGEMENT BOARD FOR PUERTO RICO, : Title III
:
as representative of : Case No. 17-BK-3283 (LTS)
:
THE COMMONWEALTH OF PUERTO RICO, *et al.*, : (Jointly Administered)
:
Debtors.¹ :
-----X

ORDER

The Court, having considered the above Application for Admission *Pro Hac Vice* of Michael A. Friedman, orders that:

_____ The application be granted. The Clerk of Court shall deposit the admission fee to the account of Non-Appropriated Funds of this Court.

_____ The application be denied. The Clerk of Court shall return the admission fee to the applicant.

SO ORDERED.

In San Juan, Puerto Rico, this ____ day of _____ 202__.

HON. LAURA TAYLOR SWAIN
U.S. District Judge

¹ The Debtors in these jointly-administered PROMESA title III cases, along with each Debtor's respective title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are: (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric and Power Authority (Bankruptcy Case No. 17 BK 4780) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (Bankruptcy Case No. 19 BK 5523-LTS) (Last Four Digits of Federal Tax ID: 3801).